

**BEFORE THE JUDICIAL PANEL ON MULTI-DISTRICT  
LITIGATION**

In re: AMERIQUEST MORTGAGE CO.     )  
MORTGAGE LENDING PRACTICES     )  
LITIGATION     )     MDL Docket No. 1715  
   )

**NOTICE OF POTENTIAL TAG-ALONG ACTION**

PLEASE TAKE NOTICE that, pursuant to J.P.M.L. Rules 7.2(i) and 7.5(e), the undersigned counsel for the plaintiff gives notice of the following potential tag-along action:

1. *Cooley et al. v. Ameritrust Mortgage Company, Inc.*, Case No.

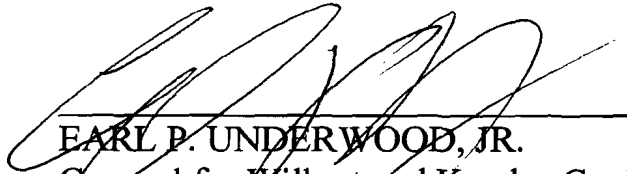
**1:06-cv-00215-BH-M** (Southern District of Alabama, Southern

Division) Judge W. B. Hand, presiding. A true and correct copy of the complaint in the Tag-along Action is attached as Exhibit A.

Plaintiff in this Tag-along Action are plaintiffs in the putative national class actions transferred by the Panel to the Northern District of Illinois for consolidated and coordinated pretrial proceedings (the "Borrowers' Consolidated Class). These Tag-along Actions allege the same general conduct, claim the same injury and seek the same relief as the Borrowers' Consolidated Class Action. Likewise, these Tag-along Actions rely upon the same legal theories, require the same or similar factual determinations, and are governed by the same law.

Therefore, the Plaintiff respectfully requests that the Panel transfer this Tag-along Action to the Northern District of Illinois pursuant to J.P.M.L. Rule 7.4.

Respectfully submitted this 10<sup>th</sup> day of July, 2007.



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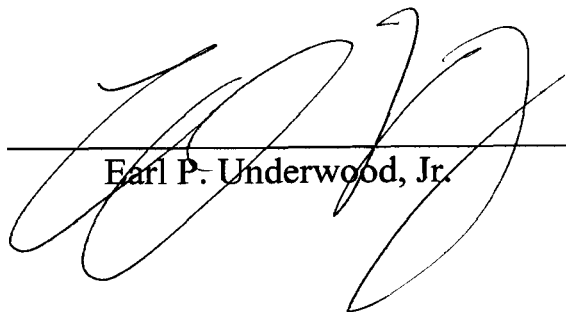
CERTIFICATE OF SERVICE

I hereby certify that on this the 10<sup>th</sup> day of July, 2007, a copy of the foregoing was served on counsel for all parties to this proceeding by placing a copy of same in the U.S. Mail, properly addressed and first-class postage prepaid to:

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